

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

INSIGHT GLOBAL, LLC,

Plaintiff,

vs.

DANIEL WENZEL, LUKE NORMAN,
LAUREN SUTMAR, and
BEACON HILL STAFFING GROUP, LLC,

Defendants.

CASE NO. 1:17-CV-8323-PGG

DECLARATION OF CHARLOTTE BEDNAR, ESQ. AND APPENDIX TO
DEFENDANTS' LOCAL RULE 56.1 STATEMENT OF UNDISPUTED MATERIAL
FACTS

I, Charlotte L. Bednar, Esq., declare, upon personal knowledge and under penalty of perjury, that the following is true and correct:

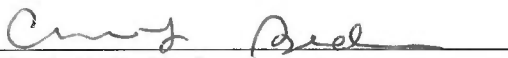
1. I am a member of the law firm Eckert Seamans Cherin & Mellott, LLC, attorneys for Defendants Daniel Wenzel, Luke Norman, Lauren Sutmar, and Beacon Hill Staffing Group, LLC in the above-captioned matter. I submit this declaration in support of Defendants' Motion for Summary Judgment.

2. Pursuant to the Individual Rules of Practice of this Court, set forth below is an index of the record authority cited in Defendants' Statement of Undisputed Material Facts, which documents are annexed hereto:

EX.	DESCRIPTION OF EXHIBIT
1	A true and accurate copy of the Second Amended Complaint filed by Insight in the above-captioned case (the "SAC").
2	A true and accurate copy of the Report of Ian Ratner, CPA/ABV, ASA, CFE, for Plaintiff Insight Global LLC, June 20, 2018 (the "Ratner Report")
3	A true and accurate copy of excerpts from the transcript of the Rule 30(b)(6) Deposition of Insight Global, LLC, May 24, 2018 ("IG Dep. Vol. I")
4	A true and accurate copy of excerpts from the transcript of the continued Rule 30(b)(6) Deposition of Insight Global, LLC, August 1, 2018 ("IG Dep. Vol. II")
5	A true and accurate copy of excerpts from the transcript of the deposition of Skylar Cuppy, May 30, 2018 ("Cuppy Dep.")
6	A true and accurate copy of excerpts from the transcript of the deposition of Lauren Sutmar, April 25, 2018 ("Sutmar Dep.")
7	A true and accurate copy of excerpts from the transcript of the deposition of Daniel Wenzel, April 26, 2018 ("Wenzel Dep.")
8	A true and accurate copy of excerpts from the transcript of the deposition of Luke Norman, April 24, 2018 ("Norman Dep.")
9	A true and accurate copy of the January 4, 2019 Affidavit of Luke Norman ("Norman Aff.")
10	A true and accurate copy of Exhibit 11 to the Deposition of Lauren Sutmar, the "Call Sheet" referred to in the Ratner Report, a document Bates Numbered IG_0000569-570 (the "Call Sheet")
11	A true and accurate copy of the "Designee Packet" referred to in the Ratner Report, a document Bates Numbered LS000007-54 (the "Designee Packet")
12	A true and accurate copy of the following website, accessed on December 31, 2018: https://blog.classesandcareers.com/advisor/what-you-wish-you-d-known-before-your-job-interview .
13	A true and accurate copy of excerpts from the transcript of the deposition of Ian Ratner, August 8, 2018 ("Ratner Dep.")

14	A true and accurate copy of excerpts from the transcript of the Rule 30(b)(6) deposition of Beacon Hill ("BH Dep. Vol. I")
15	A true and accurate copy of excerpts from the transcript of the deposition of Lindsay Kaplan ("Kaplan Dep.")
16	A true and accurate copy of excerpts from the transcript of the deposition of Samantha Occampo ("Occampo Dep.")
17	A true and accurate copy of Defendants' First Requests for Admissions to Insight and Insight's Responses to the First Requests for Admissions
18	A true and accurate copy of the April 11, 2016 Settlement Agreement.

Executed this 7th day of January, 2019, in Boston, Massachusetts.


Charlotte L. Bednar

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served upon all counsel of via electronic mail on this 7th day of January 2019, upon the following counsel:

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/s/ Charlotte L. Bednar